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Attorneys for Lehman Brothers Holdings Inc. and
Certain of Its Affiliates

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

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In re	: Chapter 11 Case No.
LEHMAN BROTHERS HOLDINGS INC., <i>et al.</i> ,	: 08-13555 (JMP)
Debtors.	: (Jointly Administered)
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**CERTIFICATE OF NO OBJECTION UNDER
28 U.S.C. § 1746 REGARDING OMNIBUS CLAIMS
OBJECTIONS SCHEDULED FOR HEARING ON DECEMBER 19, 2013**

TO THE HONORABLE JAMES M. PECK
UNITED STATES BANKRUPTCY JUDGE:

Pursuant to 28 U.S.C. § 1746, and in accordance with this Court's case management procedures set forth in the Amended Order Pursuant to Section 105(a) of the Bankruptcy Code and Bankruptcy Rules 1015(c) and 9007 Implementing Certain Notice and Case Management Procedures [ECF No. 9635] (the "Second Amended Case Management Order"), the undersigned hereby certifies as follows:

1. Lehman Brothers Holdings Inc. ("LBHI") and its affiliated debtors in the above-referenced chapter 11 cases, as debtors and debtors in possession (collectively, the "Debtors"), or LBHI as Plan Administrator under the Modified Third Amended Joint Chapter 11 Plan of LBHI and its Affiliated Debtors (the "Plan Administrator"), filed the following motions

and omnibus claims objections (collectively, the “Claims Objections”) with the Court for hearing on or before December 19, 2013:

- (a) Four Hundred Fortieth Omnibus Objection to Claims (Insufficient Documentation Claims) [ECF No. 40472]
- (b) Plan Administrator's Objection to Proof of Claim No. 25048 Filed by Beverly M. Newman [ECF No. 40958]
- (c) Motion Pursuant to Section 502(c) of the Bankruptcy Code and Section 9.3 of the Modified Third Amended Joint Chapter 11 Plan of Lehman Brothers Holdings Inc. and Its Affiliated Debtors to Estimate the Allowed Amounts of Certain Employee Indemnification Claims [ECF No. 41043]
- (d) Four Hundred Forty-Seventh Omnibus Objection to Claims (Insufficient Documentation Claims) [ECF No. 41046]

2. In accordance with the Second Amended Case Management Order, the Debtors, or the Plan Administrator, as applicable, established deadlines (the “Response Deadline”) for each Claim Objection for parties to object or file responses. The Response Deadlines have been extended for certain creditors from time to time. The Second Amended Case Management Order provides that pleadings may be granted without a hearing, provided that no objections or other responsive pleadings have been filed on or prior to the relevant response deadline and the attorney for the entity who filed the pleading complies with the relevant procedural and notice requirements.

3. The Response Deadlines have now passed and, to the best of my knowledge, no responsive pleadings to the Claims Objections have been (a) filed with the Court on the docket of the above-referenced cases in accordance with the procedures set forth in the Second Amended Case Management Order, or (b) served on counsel to the Debtors or the Plan Administrator (or such responsive pleadings have been withdrawn) by any of the holders of the claims included on Exhibit 1 to any of the Orders attached hereto, which include only the proofs

of claim for which the Claims Objection will be granted. Responses to certain of the Claims Objections were filed on the docket, or served on the Debtors or the Plan Administrator, by holders of certain proofs of claim included on the Claims Objections. The hearing on the Claims Objections as to any proof of claim for which a response was either filed on the docket or received by the Debtors or the Plan Administrator, and which response has not been resolved, has been adjourned to a future date.

4. Accordingly, the Debtors and the Plan Administrator respectfully request that the proposed orders granting the Claims Objections annexed hereto as Exhibits A through D, which, except for the inclusion of additional language to indicate that such order is supplemental to a previously entered order for a Claim Objection or to reference the inclusion of separate exhibits attached to the proposed orders for proofs of claim for which the Claims Objection is granted, adjourned or withdrawn, are unmodified since the filing of the Claims Objections, be entered in accordance with the procedures described in the Second Amended Case Management Order.

I declare that the foregoing is true and correct.

Dated: December 19, 2013
New York, New York

/s/ Robert J. Lemons
Robert J. Lemons

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Attorneys for Lehman Brothers Holdings Inc. and
Certain of Its Affiliates

EXHIBIT A
(Proposed Order – ECF No. 40472)

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

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In re	:	Chapter 11 Case No.
	:	
LEHMAN BROTHERS HOLDINGS INC., <i>et al.</i> ,	:	08-13555 (JMP)
	:	
Debtors.	:	(Jointly Administered)
-----X		

**SUPPLEMENTAL ORDER GRANTING FOUR HUNDRED FORTIETH
OMNIBUS OBJECTION TO CLAIMS (INSUFFICIENT DOCUMENTATION CLAIMS)**

Upon the four hundred fortieth omnibus objection to claims, dated October 15, 2013 (the “Four Hundred Fortieth Omnibus Objection to Claims”),¹ of Lehman Brothers Holdings Inc., as Plan Administrator under the Modified Third Amended Joint Chapter 11 Plan of Lehman Brothers Holdings Inc. and its Affiliated Debtors, pursuant to section 502(b) of title 11 of the United States Code (the “Bankruptcy Code”), Rule 3007(d) of the Federal Rules of Bankruptcy Procedure, and this Court’s order approving procedures for the filing of omnibus objections to proofs of claim [ECF No. 6664], seeking to disallow and expunge the Insufficient Documentation Claims, all as more fully described in the Four Hundred Fortieth Omnibus Objection to Claims; and due and proper notice of the Four Hundred Fortieth Omnibus Objection to Claims having been provided, and it appearing that no other or further notice need be provided; and the Court having found and determined that the relief sought in the Four Hundred Fortieth Omnibus Objection to Claims is in the best interests of the Chapter 11 Estates, their creditors, and all parties in interest, and that the legal and factual bases set forth in the Four Hundred Fortieth Omnibus Objection to Claims establish just cause for the relief granted herein; and after due deliberation and sufficient cause appearing therefor, it is

¹ Capitalized terms used herein and not otherwise defined herein shall have the meanings ascribed to such terms in the Four Hundred Fortieth Omnibus Objection to Claims.

ORDERED that the relief requested in the Four Hundred Fortieth Omnibus Objection to Claims is granted to the extent provided herein; and it is further

ORDERED that, pursuant to section 502(b) of the Bankruptcy Code, the claims listed on Exhibit 1 annexed hereto are disallowed and expunged in their entirety with prejudice; and it is further

ORDERED that this Order has no res judicata, estoppel, or other effect on the validity, allowance, or disallowance of, and all rights to object and defend on any basis are expressly reserved with respect to any claim listed on Exhibit A annexed to the Four Hundred Fortieth Omnibus Objection to Claims that is not listed on Exhibit 1 annexed hereto; and it is further

ORDERED that this Court shall retain jurisdiction to hear and determine all matters arising from or related to this Order.

Dated: _____, 2013
New York, New York

UNITED STATES BANKRUPTCY JUDGE

Exhibit 1

OMNIBUS OBJECTION 440: EXHIBIT 1 - INSUFFICIENT DOCUMENTS

NAME	CASE NUMBER	DEBTOR NAME	FILED DATE	CLAIM #	ASSERTED TOTAL CLAIM DOLLARS	AMOUNTS TO BE DISALLOWED	REASON FOR PROPOSED DISALLOWANCE
1 DIAMOND FINANCE PUBLIC LIMITED COMPANY SERIES 2007-07	08-13555 (JMP)	Lehman Brothers Holdings Inc.	09/18/2009	18002	Undetermined	Undetermined	Insufficient Documents
2 DIAMOND FINANCE PUBLIC LIMITED COMPANY SERIES 2007-07	08-13888 (JMP)	Lehman Brothers Special Financing Inc.	09/18/2009	18003	Undetermined	Undetermined	Insufficient Documents
3 RUBY FINANCE PLC SERIES 2007-7	08-13555 (JMP)	Lehman Brothers Holdings Inc.	09/21/2009	25978	Undetermined	Undetermined	Insufficient Documents
4 RUBY FINANCE PLC SERIES 2007-7	08-13888 (JMP)	Lehman Brothers Special Financing Inc.	09/21/2009	25981	Undetermined	Undetermined	Insufficient Documents
TOTAL					\$0.00	\$0.00	

EXHIBIT B
(Proposed Order – ECF No. 40958)

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

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In re : Chapter 11 Case No.
 :
LEHMAN BROTHERS HOLDINGS INC., *et al.*, : 08-13555 (JMP)
 :
Debtors. : (Jointly Administered)
-----X

**ORDER GRANTING OBJECTION
TO PROOF OF CLAIM NO. 25048 FILED BY BEVERLY NEWMAN**

Upon the objection, dated November 4, 2013 (the “Objection to Claim”), of Lehman Brothers Holdings Inc, as Plan Administrator under the Modified Third Amended Joint Chapter 11 Plan of Lehman Brothers Holdings Inc. and its Affiliated Debtors (the “Plan”), pursuant to section 502 of title 11 of the United States Code (the “Bankruptcy Code”) and Rule 3007 of the Federal Rules of Bankruptcy Procedure, seeking disallowance and expungement of the Claim of Beverly Newman, all as more fully described in the Objection to Claim; and due and proper notice of the Objection to Claim having been provided, and it appearing that no other or further notice need be provided; and the Court having found and determined that the relief sought in the Objection to Claim is in the best interests of the Chapter 11 Estates (as such term is defined the Objection to Claim), their, creditors, and all parties in interest and that the legal and factual bases set forth in the Objection to Claim establish just cause for the relief granted herein; and after due deliberation and sufficient cause appearing therefor, it is

ORDERED that the relief requested in the Objection to Claim is granted; and it is further

ORDERED that pursuant to section 502(b) of the Bankruptcy Code, Claim No. 25048 is disallowed and expunged in its entirety with prejudice; and it is further

ORDERED that the Court-appointed claims and noticing agent is authorized and directed to delete Claim No. 25048 from the official claims registry; and it is further

ORDERED that this Court shall retain jurisdiction to hear and determine all matters arising from or related to this Order.

Dated: _____, 2013
New York, New York

UNITED STATES BANKRUPTCY JUDGE

EXHIBIT C
(Proposed Order – ECF No. 41043)

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

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In re	:
	:
LEHMAN BROTHERS HOLDINGS INC., <i>et al.</i>,	:
	:
Debtors.	:
	:
-----X	

Chapter 11 Case No.
08-13555 (JMP)
(Jointly Administered)

**ORDER PURSUANT TO SECTION 502(C) OF THE BANKRUPTCY CODE AND
SECTION 9.3 OF THE MODIFIED THIRD AMENDED JOINT CHAPTER 11 PLAN
OF LEHMAN BROTHERS HOLDINGS INC. AND ITS AFFILIATED DEBTORS
ESTIMATING THE ALLOWED AMOUNTS OF CERTAIN PROOFS OF CLAIM**

Upon the motion (the “Motion”) dated November 12, 2013 of Lehman Brothers Holdings Inc. (“LBHI” or the “Plan Administrator”), as Plan Administrator under the Modified Third Amended Joint Chapter 11 Plan of Lehman Brothers Holdings Inc. and Its Affiliated Debtors (the “Plan”)¹, for approval, pursuant to section 9.3 of the Plan and section 502(c) of title 11 of the United States Code (the “Bankruptcy Code”), to estimate the Allowed amounts of certain proofs of claim or portions thereof, all as more fully described in the Motion; and the Court having jurisdiction to consider the Motion and the relief requested therein in accordance with 28 U.S.C. §§ 157 and 1334 and the Amended Standing Order of Reference M-431, dated January 31, 2012 (Preska, C.J.); and consideration of the Motion and the relief requested therein being a core proceeding pursuant to 28 U.S.C. § 157(b); and venue being proper before this Court pursuant to 28 U.S.C. §§ 1408 and 1409; and due and proper notice of the Motion having been provided to (i) the United States Trustee for Region 2; (ii) the Securities and Exchange Commission; (iii) the Internal Revenue Service; (iv) the United States Attorney for the Southern

¹ Capitalized terms used but not otherwise defined herein shall have the meanings ascribed to such terms in the Motion.

District of New York; (v) the Claimants listed on Exhibit 1; and (vi) all other parties entitled to notice in accordance with the procedures set forth in the second amended order entered on June 17, 2010 governing case management and administrative procedures for these cases [ECF No. 9635]; and it appearing that no other or further notice need be provided; and a hearing having been held to consider the relief requested in the Motion; and the Court having found and determined that the relief sought in the Motion is in the best interests of the Chapter 11 Estates, their creditors, and all parties in interest and that the legal and factual bases set forth in the Motion establish just cause for the relief granted herein; and after due deliberation and sufficient cause appearing therefor, it is

ORDERED that the Motion is granted as provided herein; and it is further

ORDERED that, pursuant to section 9.3 of the Plan and section 502(c) of the Bankruptcy Code, each of the claims or portions of claims identified on Exhibit 1 attached hereto is hereby estimated in the Allowed amount of zero dollars (\$0.00); and it is further

ORDERED that this Order has no res judicata, estoppel, or other effect on the validity, allowance, or disallowance of, and all rights to object and defend on any basis are expressly reserved with respect to, (i) any claim listed on Exhibit A attached to the Motion that is not listed on Exhibit 1 attached hereto and (ii) the portion of any claim on Exhibit 1 that is not the subject of the Motion; and it is further

ORDERED that this Court shall retain jurisdiction to hear and determine all
matters arising from or related to this Order.

Dated: New York, New York
_____, 2013

Honorable James M. Peck
United States Bankruptcy Judge

Exhibit 1

(Claims or Portions of Claims to Be Estimated in the Allowed Amount of Zero Dollars)

08-13555-11; LEHMAN BROTHERS HOLDINGS INC. v. LITIGANTS, ET AL. (JMP) Document
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CLAIMS OR PORTIONS OF CLAIMS TO BE ESTIMATED IN THE ALLOWED AMOUNT OF ZERO DOLLARS

NAME	CASE NUMBER	DEBTOR NAME	CLAIM #	AMOUNTS TO BE ESTIMATED AT \$0.00	CATEGORY OF EMPLOYEE INDEMNIFICATION CLAIM
1 BOSSUNG, BRETT	08-13555 (JMP)	Lehman Brothers Holdings Inc.	29626	Undetermined*	Litigation Claim
2 COHEN, KENNETH	08-13555 (JMP)	Lehman Brothers Holdings Inc.	29625	Undetermined*	No Litigation Claim
3 GOLDFARB, DAVID	08-13555 (JMP)	Lehman Brothers Holdings Inc.	12843	Undetermined	Litigation Claim
4 GRIEB, EDWARD	08-13555 (JMP)	Lehman Brothers Holdings Inc.	12666	Undetermined	Litigation Claim
5 HOULIHAN, BRENNIA	08-13555 (JMP)	Lehman Brothers Holdings Inc.	28242	Undetermined	Litigation Claim
6 HUGHSON, PAUL	08-13555 (JMP)	Lehman Brothers Holdings Inc.	29627	\$10,950.00 plus unliquidated and/or undetermined amounts*	No Litigation Claim
7 KIRK, ALEX	08-13555 (JMP)	Lehman Brothers Holdings Inc.	23919	Undetermined*	No Litigation Claim
8 MCCARTHY, LAWRENCE E	08-13555 (JMP)	Lehman Brothers Holdings Inc.	66392	Undetermined*	No Litigation Claim
9 MCDADE, HERBERT H., III	08-13555 (JMP)	Lehman Brothers Holdings Inc.	24721	Undetermined	Litigation Claim
10 MCKINNEY, RICHARD	08-13555 (JMP)	Lehman Brothers Holdings Inc.	12668	Undetermined	Litigation Claim
11 MITCHELL, NEIL	08-13555 (JMP)	Lehman Brothers Holdings Inc.	28243	Undetermined	Litigation Claim
12 O'REILLY, DAVID	08-13555 (JMP)	Lehman Brothers Holdings Inc.	19435	Undetermined	Litigation Claim

* For the avoidance of doubt, the Motion does not seek to estimate any portion of this proof of claim other than the Employee Indemnification Claim.

08-13555-11; LEHMAN BROTHERS HOLDINGS INC. v. ODRICH, MICHAEL J. et al. (JMP) Document
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 CLAIMS OR PORTIONS OF CLAIMS TO BE ESTIMATED IN THE ALLOWED AMOUNT OF ZERO DOLLARS

NAME	CASE NUMBER	DEBTOR NAME	CLAIM #	AMOUNTS TO BE ESTIMATED AT \$0.00	CATEGORY OF EMPLOYEE INDEMNIFICATION CLAIM
13 ODRICH, MICHAEL J.	08-13555 (JMP)	Lehman Brothers Holdings Inc.	20199	Undetermined*	Litigation Claim
14 ODRICH, MICHAEL J.	08-13555 (JMP)	Lehman Brothers Holdings Inc.	20200	Undetermined*	Litigation Claim
15 RUSSO, THOMAS	08-13555 (JMP)	Lehman Brothers Holdings Inc.	13060	Undetermined	Litigation Claim
16 SCHAEFER, JEFF	08-13555 (JMP)	Lehman Brothers Holdings Inc.	22768	Undetermined*	Litigation Claim
17 SEERY, JAMES P	08-13555 (JMP)	Lehman Brothers Holdings Inc.	23554	Undetermined*	No Litigation Claim
18 SHAPIRO, MARK	08-13555 (JMP)	Lehman Brothers Holdings Inc.	22200	Undetermined	Litigation Claim
19 SMITH, KRISTINE	08-13555 (JMP)	Lehman Brothers Holdings Inc.	12842	Undetermined	Litigation Claim
20 SULLIVAN, JAMES J.	08-13555 (JMP)	Lehman Brothers Holdings Inc.	12670	Undetermined	Litigation Claim
21 TABET, SAMIR	08-13555 (JMP)	Lehman Brothers Holdings Inc.	12674	Undetermined	Litigation Claim
22 UVINO, WENDY M.	08-13555 (JMP)	Lehman Brothers Holdings Inc.	12853	Undetermined	Litigation Claim
23 VOLINI, PIERLUIGI	08-13555 (JMP)	Lehman Brothers Holdings Inc.	25900	Undetermined*	No Litigation Claim
24 WALSH, MARK	08-13555 (JMP)	Lehman Brothers Holdings Inc.	29624	Undetermined*	Litigation Claim

* For the avoidance of doubt, the Motion does not seek to estimate any portion of this proof of claim other than the Employee Indemnification Claim.

08-13555-11; LEHMAN BROTHERS HOLDINGS INC. v. SECURITIES AND EXCHANGE COMMISSION (JMP) Document
Pg 19 of 24
CLAIMS OR PORTIONS OF CLAIMS TO BE ESTIMATED IN THE ALLOWED AMOUNT OF ZERO DOLLARS

NAME	CASE NUMBER	DEBTOR NAME	CLAIM #	AMOUNTS TO BE ESTIMATED AT \$0.00	CATEGORY OF EMPLOYEE INDEMNIFICATION CLAIM
25 WITHERELL, BRUCE	08-13555 (JMP)	Lehman Brothers Holdings Inc.	16228	Undetermined	Litigation Claim
26 WOOD, KARL	08-13555 (JMP)	Lehman Brothers Holdings Inc.	16227	Undetermined	Litigation Claim
27 ZUSY, MARK	08-13555 (JMP)	Lehman Brothers Holdings Inc.	13063	Undetermined	Litigation Claim
TOTAL				\$10,950.00	

EXHIBIT D
(Proposed Order – ECF No. 41046)

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

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In re : **Chapter 11 Case No.**
 :
LEHMAN BROTHERS HOLDINGS INC., et al., : **08-13555 (JMP)**
 :
Debtors. : **(Jointly Administered)**
-----X

**ORDER GRANTING FOUR HUNDRED FORTY-SEVENTH OMNIBUS
OBJECTION TO CLAIMS (INSUFFICIENT DOCUMENTATION CLAIMS)**

Upon the four hundred forty-seventh omnibus objection to claims, dated November 13, 2013 (the “Four Hundred Forty-Seventh Omnibus Objection to Claims”),¹ of Lehman Brothers Holdings Inc., as Plan Administrator under the Modified Third Amended Joint Chapter 11 Plan of Lehman Brothers Holdings Inc. and its Affiliated Debtors, pursuant to section 502(b) of title 11 of the United States Code (the “Bankruptcy Code”), Rule 3007(d) of the Federal Rules of Bankruptcy Procedure, and this Court’s order approving procedures for the filing of omnibus objections to proofs of claim [ECF No. 6664], seeking to disallow and expunge the Insufficient Documentation Claims, all as more fully described in the Four Hundred Forty-Seventh Omnibus Objection to Claims; and due and proper notice of the Four Hundred Forty-Seventh Omnibus Objection to Claims having been provided, and it appearing that no other or further notice need be provided; and the Court having found and determined that the relief sought in the Four Hundred Forty-Seventh Omnibus Objection to Claims is in the best interests of the Chapter 11 Estates, their creditors, and all parties in interest, and that the legal and factual bases set forth in the Four Hundred Forty-Seventh Omnibus Objection to Claims establish just

¹ Capitalized terms used herein and not otherwise defined herein shall have the meanings ascribed to such terms in the Four Hundred Forty-Seventh Omnibus Objection to Claims.

cause for the relief granted herein; and after due deliberation and sufficient cause appearing therefor, it is

ORDERED that the relief requested in the Four Hundred Forty-Seventh Omnibus Objection to Claims is granted to the extent provided herein; and it is further

ORDERED that, pursuant to section 502(b) of the Bankruptcy Code, the claims listed on Exhibit 1 annexed hereto are disallowed and expunged in their entirety with prejudice; and it is further

ORDERED that this Order has no res judicata, estoppel, or other effect on the validity, allowance, or disallowance of, and all rights to object and defend on any basis are expressly reserved with respect to any claim listed on Exhibit A annexed to the Four Hundred Forty-Seventh Omnibus Objection to Claims that is not listed on Exhibit 1 annexed hereto; and it is further

ORDERED that this Court shall retain jurisdiction to hear and determine all matters arising from or related to this Order.

Dated: _____, 2013
New York, New York

UNITED STATES BANKRUPTCY JUDGE

Exhibit 1

OMNIBUS OBJECTION 447: EXHIBIT 1 - INSUFFICIENT DOCUMENTS

NAME	CASE NUMBER	DEBTOR NAME	FILED DATE	CLAIM #	ASSERTED TOTAL CLAIM DOLLARS	AMOUNTS TO BE DISALLOWED	REASON FOR PROPOSED DISALLOWANCE
1 SAPHIR FINANCE PUBLIC LIMITED COMPANY SERIES 2005-3A	08-13888 (JMP)	Lehman Brothers Special Financing Inc.	09/22/2009	29725	Undetermined	Undetermined	Insufficient Documents
2 SAPHIR FINANCE PUBLIC LIMITED COMPANY SERIES 2005-3A	08-13555 (JMP)	Lehman Brothers Holdings Inc.	09/22/2009	29726	Undetermined	Undetermined	Insufficient Documents
TOTAL					\$0.00	\$0.00	